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Attorneys for Defendant  
HITACHI DISPLAYS, LTD. (n/k/a JAPAN  
DISPLAY INC.)

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

CASE NO.: 3:07-cv-05944-SC

MDL NO.: 1917

This Document Relates To:

*All Actions.*

DECLARATION OF TAKETERU  
KAKESU IN SUPPORT OF HITACHI  
DISPLAYS, LTD. (n/k/a JAPAN DISPLAY  
INC.)'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT ON DUE  
PROCESS GROUNDS

DECLARATION OF TAKETERU KAKESU IN SUPPORT  
OF HITACHI DISPLAYS, LTD.' (N/K/A JAPAN DISPLAY  
INC.)'S MOTION FOR PARTIAL SUMMARY JUDGMENT  
ON DUE PROCESS GROUNDS

CASE NO.: 3:07-cv-05944-SC  
MDL NO.: 1917

1 I, Taketeru Kakesu, hereby declare:

2 1. I am over the age of eighteen, and am not a party to this action. I have personal  
3 knowledge of the facts and matters stated herein and, if called, could and would testify competently  
4 to them. Although English is not my native language, I fully understand the contents of this  
5 Declaration.

6 2. I am currently employed by Japan Display Inc. ("JDI"), as Technical Specialist of the  
7 Logistics & Foreign Trade Affairs Department. I am authorized to make this declaration on behalf  
8 of Hitachi Displays, Inc. (n/k/a Japan Display Inc.) ("HDP"). I am informed and believe that the  
9 matters stated in this declaration are true.

10 3. HDP was a Japanese corporation with its principal place of business at 3300, Hayano,  
11 Mobara-shi, Chiba-ken, 297-8622, Japan.

12 4. HDP never manufactured or sold cathode ray tubes ("CRTs"). HDP did not sell or  
13 manufacture CRT Products in the United States. HDP did not sell CRTs to consumers because  
14 CRTs are not a standalone product.

15 5. Based on the information reasonably available to JDI today, between March 1, 1995  
16 and November 25, 2007, the Relevant Period alleged by the plaintiffs in this case, HDP had no sales  
17 of CRTs or CRT Products to customers located in Arizona, California, Florida, Illinois,  
18 Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico,  
19 North Carolina, or Wisconsin (collectively, the "Relevant States").

20 6. HDP had no offices in the Relevant States during the Relevant Period. JDI has no  
21 offices in Arizona, Florida, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada,  
22 New York, New Mexico, North Carolina, or Wisconsin.

23 7. Based on the information reasonably available to JDI today, HDP did not own  
24 property in the Relevant States, and HDP did not acquire or lease property in the Relevant States  
25 during the Relevant Period. JDI does not own or lease property Arizona, Florida, Massachusetts,  
26 Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico, North Carolina, or  
27 Wisconsin.

9. HDP did not file and was not required to file taxes in the Relevant States during the Relevant Period. JDI has not filed and has not been required to file taxes in Arizona, Florida, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico, North Carolina, or Wisconsin.

10. Neither JDI nor HDP has ever held any formal meetings of its directors or shareholders in the Relevant States.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 6  
day of November, 2014 in Chiba, Japan.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 6  
day of November, 2014 in Chiba, Japan.

Takateru Kakesu